

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	Case No.:2:15-mj-00810-GWF
)	
Plaintiff,)	
)	
vs.)	STIPULATION TO CONTINUE
)	BENCH TRIAL
)	(First Request)
ALEJANDRO PARRA-NAVARRETE,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Nadia Ahmed, Special Assistant United States Attorney, counsel for the United States of America, and Kyle R. Tatum, Esquire, counsel for defendant **ALEJANDRO PARRA-NAVARRETE**, that the bench trial in the above-captioned matter, currently scheduled for February 3, 2016, at the hour of 9:00 a.m., be vacated and continued for sixty (60) days or to a date and time convenient to the Court.

This stipulation is entered into for the following reasons:

1. The parties are in the process of negotiating a resolution of the case that would obviate the need for trial. The parties need additional time to do so.
2. Defendant is out of federal custody and agrees to the continuance.

3. Denial of this request for a trial continuance would prejudice both the Defendants and the Government and unnecessarily consume this Court's valuable resources, taking into account the exercise of due diligence.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this stipulation, is excludable in computing the time within which the defendant must be indicted and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(b) and 3161(h)(8)(A), considering the factors under 18 U.S.C. § 3161(h)(8)(B)(I) and (iv).

6. This is the first request for continuance of the trial in this case.

DATED this 2nd day of February, 2016.

Respectfully submitted,

DANIEL G. BOGDEN
United States Attorney

/s/ Kyle Tatum

/s/ Nadia Ahmed

KYLE A. TATUM, ESQ.
Counsel for defendant
ALEJANDRO PARRA-NAVARRETE

NADIA AHMED
Special Assistant United States Attorney

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